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VIA ELECTRONIC SUBMISSION

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TWB-204
Washington, DC 20554

RE: IP-Enabled Services, WC Docket 04-36
E911 Requirements for IP-Enabled Service Providers, WC Docket 05-196

Dear Ms. Dortch:

On January 10, 2006, J. Manning Lee (via conference call), Thomas Hughes, Jack Zinman, David Barlow and I, of AT&T, met with Kathy Berthot and Elizabeth Mumaw of the Enforcement Bureau and Nicholas Alexander and Jennifer Schneider of the Wireline Competition Bureau. The purpose of the meeting was to discuss the technical limitations and challenges associated with the provision of E911 services in the TDM and IP PBX environments. The attached presentation was distributed during the meeting and served as the basis of our discussion.

One electronic copy of this Notice is being submitted to the Secretary of the FCC in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

A handwritten signature in black ink that reads "Amy L. Alvarez". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

CC: Kathy Berthot
Elizabeth Mumaw
Nicholas Alexander
Jennifer Schneider

E911 Service Provision for MultiLine Telephone Systems (MLTS) such as TDM PBXs and IP PBXs

Current Processes and Limitations

IP-Enabled Services

WC Docket No. 04-36

E911 Requirements for IP-Enabled Service Providers

WC Docket No. 05-196



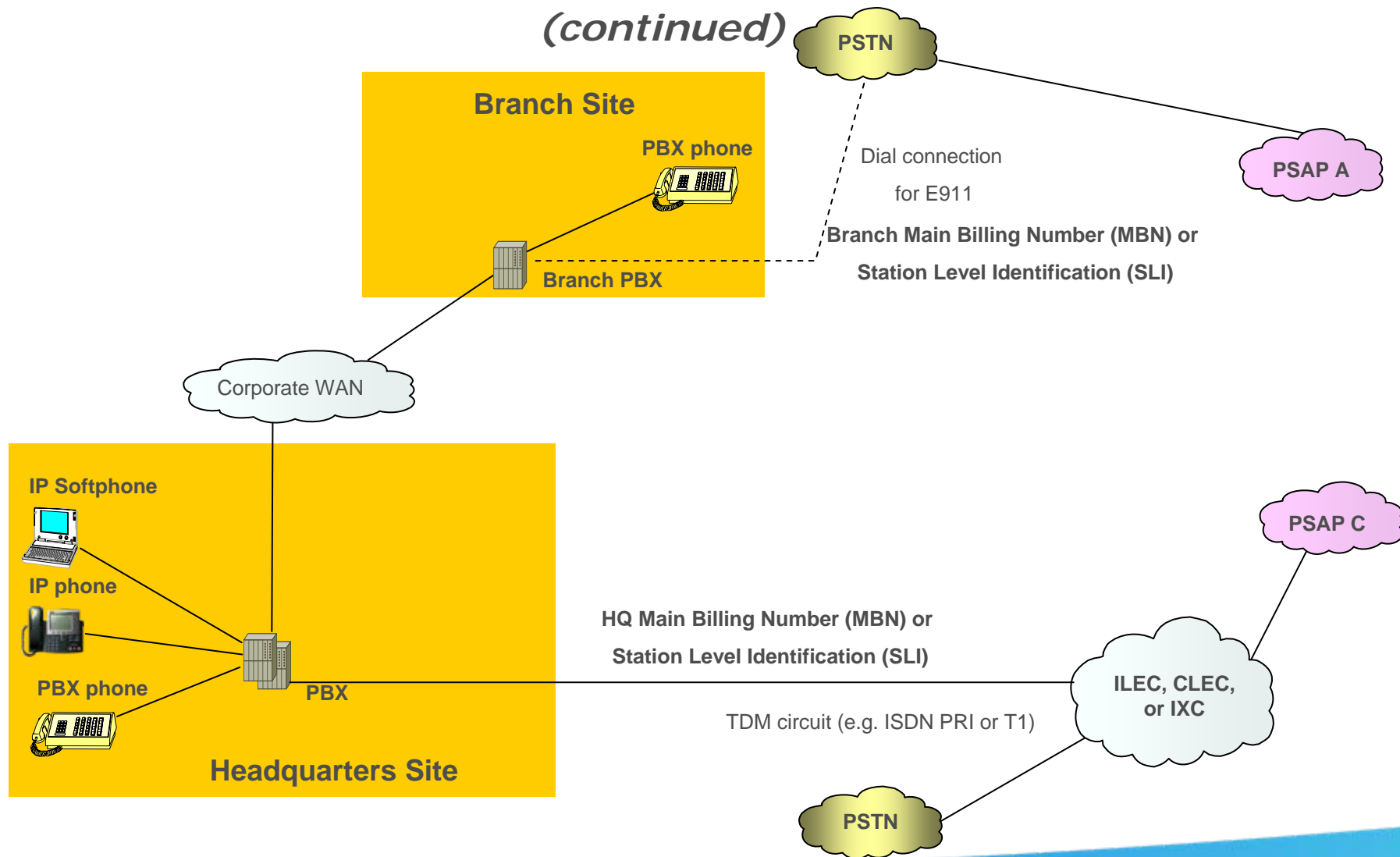
HOW DOES E911 SERVICE WORK FOR PBXs WITH TRADITIONAL WIRELINE LOCAL EXCHANGE SERVICE?

The PBX owner controls the information made available to the PSAP.

- Often just a main billed number (MBN) is sent with E911 calls from PBXs
- Transmission of individual Station Level Identification (SLI) may require PBX upgrades and involves added administrative costs for the PBX owner
- Most commonly, just company name and its general address are loaded into ALI database and sent with E911 call, not user name and individual office location
- A few states require PBX owners to send SLI, but typically employee name and precise office address are not required

HOW DOES E911 SERVICE WORK FOR PBXs WITH TRADITIONAL WIRELINE LOCAL EXCHANGE SERVICE?

(continued)



HOW DOES E911 SERVICE WORK FOR PBXs WITH TRADITIONAL WIRELINE LOCAL EXCHANGE SERVICE? (continued)

Today's PBXs can have remote and nomadic users

- Both TDM PBXs and IP PBXs can support remote and nomadic users, by allowing users to access the PBX via a corporate Intranet
- The LEC will not know which users are remote or nomadic – PBX owner manages number assignments for its end users.
- Today, any E911 calls from a remote or nomadic PBX user are processed by the PBX and LEC network as if originated at the main corporate location.
- The E911 Scope Order does not impose any special obligations in this situation

HOW SHOULD E911 SERVICE WORK FOR PBXs WITH BUSINESS VoIP SERVICES?

Business VoIP services can connect directly to an IP PBX or via a gateway to a TDM PBX, providing the same capabilities as ISDN PRIs as well as added VoIP features.

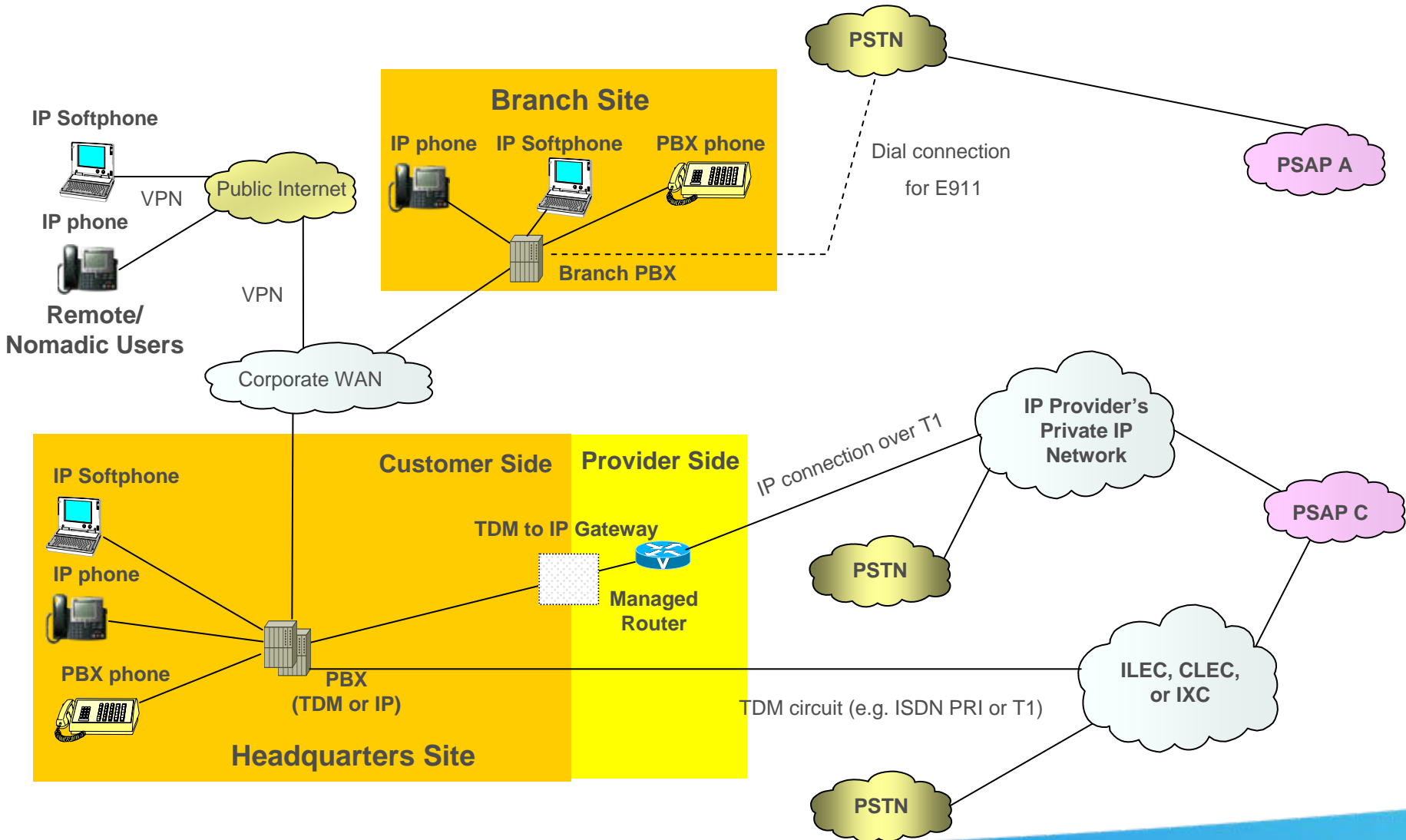
The PBX owner chooses the information sent to PSAP; use of VoIP service does not change this.

- Same data limitations apply (usually no SLI, use of MBN) as with TDM service

Like TDM provider, VoIP provider has no means to identify remote or nomadic users behind the PBX.

- VoIP provider has no direct electronic connection to remote or nomadic users behind the PBX
- The PBX may route calls from users who are VoIP customers over TDM outgoing trunks, so VoIP provider may never see the calls
- PBX may only send MBN, so VoIP provider receiving E911 calls won't know which user made the call

THE PBX CAN BE CONNECTED VIA A VoIP PROVIDER INSTEAD OF OR IN ADDITION TO ILEC/CLEC CONNECTION



PRACTICAL ISSUES IN PROVIDING E911 SERVICE TO NOMADIC OR REMOTE WORKERS BEHIND A PBX

VoIP (or TDM) provider has no direct connection to user's equipment and cannot detect disconnection, so "heartbeat" solution is not viable today.

VoIP Provider also cannot be certain alternative address updates will work.

- PBX owner controls routing of outgoing calls (including E911), so E911 calls may not be routed back to VoIP provider.
- Even if E911 call is sent to VoIP provider, unless PBX sends SLI, VoIP provider cannot identify source of the E911 call to know alternate routing should apply.

ADDITIONAL PRACTICAL ISSUES IN PROVIDING VoIP SERVICES TO PBX USERS

- E911 service for PBXs served by VoIP services should be equal in quality to E911 service provided through TDM PRI services.
 - *"Rules need to be technology neutral and forward looking to accommodate the introduction of new technologies." NENA Model Legislation*
- PBX owners must be able to "mix and match" VoIP and TDM local services for diversity and redundancy.
- AT&T's Voice DNA Flexible Reach service is a VoIP offering for IP PBXs that is ready for launch.

***THE FCC E911 SCOPE ORDER AND VoIP E911 ORDER,
WHEN VIEWED TOGETHER,
PROVIDE GUIDANCE ON THIS ISSUE***

The FCC's 2003 "E911 Scope" order leaves the issue of whether to require E911 service for PBXs to the states, opposes policies that might harm VoIP deployment, and recognizes that multiple parties must cooperate to change E911 processes for PBXs. Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems CC Docket No. 94-102, IB Docket No. 99-67, 18 FCC Rcd 25340 (2003).

The FCC's VoIP 911 Order excludes IP PBXs: "The rules we adopt today apply to interconnected VoIP services rather than the sale or use of IP-compatible CPE, such as an IP-PBX, that itself uses other telecommunications services or VoIP services to terminate traffic to and receive traffic from the PSTN. The rules we adopt in today's Order also apply only to providers that offer a single service that provides the functionality described above. IP-Enabled Services (WC Docket No. 04-36) and E911 Requirements for IP-Enabled Service Providers (WC Docket No. 05-196), FCC 05-116, footnote 78.

THE NENA MODEL 911 MLTS LEGISLATION, WHICH THE FCC SUPPORTS, ALSO EXCLUDES IP PBXs

FCC has endorsed NENA Model 911 Legislation:

"[W]e believe that the Model Legislation submitted by NENA and APCO offers the states a valuable blueprint for their own laws."
(E911 Scope Order ¶ 50)

NENA Model Legislation --- Section 11 Exemptions:

"The requirements of this act shall not apply to the following types of equipment until two years after the effective date of a FCC ruling addressing implementation of Enhanced 9-1-1 support by such equipment:

- 1) MLTS Wireless Telephones;
- 2) MLTS IP Telephones; and
- 3) IP Based MLTS.

An MLTS, using a combination of conventional stations and IP or Wireless Stations, is subject to this exemption for calls made from the IP Based or Wireless Stations."

OTHER PARTIES HAVE NOTED THAT MLTS SYSTEMS PRESENT ISSUES WITH RESPECT TO VoIP E911

- CompTel Petition for Reconsideration (July 2005) requests relief for VoIP services delivered to PBXs.
- Time Warner Telecom's November 28 Compliance Report notes that it provides VoIP services to PBXs, as do its Comments on CompTel Petition.
- Broadwing's November 28 Report notes it provides VoIP services to PBXs.
- Enterprise Communications Association Comments in Docket 94-102 (February 28, 2005) note E911 limitations in MLTS situation.
- XO Communications Petition for Waiver (December 20, 2005) notes nomadic use possible with IP PBXs.

RECOMMENDATIONS

Fundamentally, the Commission's June 3 VoIP 911 Order should not be viewed as overturning or modifying the E911 Scope Order.

VoIP services connected to PBXs should be expected to deliver E911 service comparable to that provided by TDM services.

The "Interconnected VoIP Service" in the case of VoIP services provided to a PBX ends at the PBX; management of the stations behind the PBX is not part of the VoIP Provider's service and is properly the responsibility of the PBX owner.

As noted in the E911 Scope Order, changes in E911 practices for PBXs require the joint cooperation and efforts of manufacturers, PBX owners, carriers, and PSAPs.

- Should the Commission wish to revisit its E911 policies for PBXs, it cannot do so by imposing obligations on VoIP services alone – instead a joint effort of state and federal regulators, PSAPs, PBX manufacturers, wireline and VoIP providers, and other interested parties would be needed.